

Koelto, J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MISS UNIVERSE L.P., LLLP, and :
DONALD J. TRUMP, both individually and :
derivatively on behalf of :
MISS UNIVERSE L.P., LLLP, :
-----x

Plaintiffs,

-against-

UNIVISION NETWORKS & STUDIOS, INC. :
and ALBERTO CIURANA, individually,

Case No. 15 CV 5377 (JGK) (JLC)

Defendants.

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC# 15cv5377-JGK
DATE FILED: 08/20/2015

**STIPULATION AND ORDER FOR THE EXTENSION OF
TIME WITHIN WHICH TO MOVE TO DISMISS THE COMPLAINT**

WHEREAS, Plaintiffs Miss Universe L.P., LLLP and Donald J. Trump ("Plaintiffs") filed a summons and complaint (collectively, the "Complaint") in the above-captioned matter on June 30, 2015 in the Supreme Court of the State of New York, naming as defendants Univision Networks & Studios, Inc. and Alberto Ciurana ("Defendants");

WHEREAS, Plaintiffs served the Complaint on Defendant Univision Networks & Studios, Inc. on July 2, 2015;

WHEREAS, undersigned counsel for Defendants agreed to accept service on behalf of Defendant Alberto Ciurana, which service was completed on July 15, 2015;

WHEREAS, Defendants filed a Notice of Removal in this Court on July 10, 2015, and served the Notice of Removal on Plaintiffs on July 10, 2015;

WHEREAS, Defendants' response to the Complaint is currently due on August 26, 2015 by joint stipulation of the parties;

WHEREAS, Defendants intend to move to dismiss the Complaint and are ready and able to do so on or before August 26, 2015;

WHEREAS, this Court's Individual Rules of Practice require a pre-motion conference with the Court before the filing of a motion to dismiss is permitted;

WHEREAS, Defendants have been informed by the Court Clerk that given the Court's current schedule, a pre-motion conference before August 26, 2015 is impracticable;

WHEREAS, in light of the inability to schedule a pre-motion conference with the Court before August 26, 2015, the parties have agreed to further extend the time by which Defendants may move to dismiss the Complaint;

WHEREAS, this is the second time the parties have agreed and jointly stipulated to extend the time to move, answer, or otherwise respond to the Complaint;

WHEREAS, the parties agree that Plaintiffs shall be permitted 45 days within which to respond to Defendants' motion to dismiss; and

WHEREAS, this Stipulation is entered without prejudice to Defendants' right to file a reply brief responding to Plaintiffs' responsive brief;

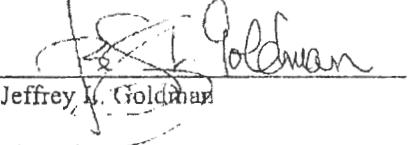
NOW THEREFORE, it is hereby stipulated and agreed, subject to the approval of the Court, that:

1. The August 26, 2015 deadline for responding to the Complaint is adjourned;
2. Defendants shall file their motion to dismiss on a date to be set by the Court at the pre-motion conference contemplated herein;
3. Plaintiffs shall have 45 days from service of Defendants' motion to dismiss to respond to the motion to dismiss; and

4. Defendants shall have the right to file a reply brief in further support of their motion to dismiss.

Dated: August 19, 2015
New York, New York

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*Attorneys for Defendants Univision Networks
& Studios, Inc. and Alberto Ciurana*

Dated: August 20, 2015
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE, PART I